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*Co-Lead Counsel for the Proposed Class in In re
Google Play Consumer Antitrust Litigation*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**IN RE GOOGLE PLAY CONSUMER
ANTITRUST LITIGATION**

RELATED ACTIONS:

Epic Games Inc. v. Google LLC et al.,
Case No. 3:20-cv-05671-JD

*In re Google Play Developer Antitrust
Litigation*, Case No. 3:20-cv-05792-JD

State of Utah, et. al., v. Google LLC, et. al.,
Case No. 3:21-cv-05227-JD

No. 3:20-CV-05761-JD

**DECLARATION OF KARMA M.
GIULIANELLI IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL AND NOTICE OF
LODGING PURSUANT TO CIVIL
LOCAL RULE 79-5**

Judge: Hon. James Donato

I, Karma M. Giulianelli, declare as follows:

1. I am an attorney duly admitted to practice in the States of Colorado and California and before this Court. I am a partner at Bartlit Beck LLP, Co-Lead Counsel for the Proposed Class in this action. I make this declaration in support of Plaintiffs' Administrative Motion to File Documents Under Seal and Notice of Lodging pursuant to Civil Local Rule 79-5. The facts set forth herein are within my personal knowledge and if called as a witness, I could and would competently testify to them.

2. In their Consolidated First Amended Complaint ("FAC"), Plaintiffs included references or quotations from materials that the Court ordered to be filed under seal. *See* MDL Dkt. 89. Plaintiffs now seek leave to amend their Complaint, and the Consolidated Second Amended Complaint ("SAC") includes the same materials the Court previously ordered to be filed under seal. Accordingly, Plaintiffs seek to file the unredacted SAC under seal in compliance with the Court's order. *See* Civil Local Rule 79-5(b); Dkt. 89 at 5, 9-13.

3. The redacted, public version of the SAC is attached as **Exhibit 1**, and the unredacted version of the SAC is attached as **Exhibit 2**. The redacted, public version of the redline of the SAC is attached as **Exhibit 3**, and the unredacted version of the redline of the SAC is attached as **Exhibit 4**. The specific portions of the SAC that are redacted in the public version are highlighted in yellow in the unredacted version, and contain references to the confidential material as follows:

SAC Paragraph	Corresponding Page and Line Number(s)
¶ 91	21:25, excluding "was willing to offer Samsung, among other things," and "as well as" 21:26-27
¶ 133	31:3, excluding "Indeed, Google has long had a 'Strategic

DECLARATION ISO PLAINTIFFS' ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL AND NOTICE OF LODGING
Case No. 3:20-CV-05761-JD

SAC Paragraph	Corresponding Page and Line Number(s)
	Marketing Agreement’ with” and “one” 31:7, excluding “devices that,” “distributes. In return, Google has agreed to pay,” and “a share of its”

4. In accordance with the Court’s order, Plaintiffs submit their request to seal and the notice of lodging the unredacted version of the SAC in compliance with Civil Local Rule 79-5.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 3rd day of December, 2021 at Denver, Colorado.

/s/ Karma M. Giulianelli